

**IN THE UNITED STATES DISTRICT COURT
FOR NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

BRYAN J. PESTA,)	CASE NO. 1:23-CV-00546-DAP
)	
Plaintiff,)	JUDGE DAN AARON POLSTER
)	
v.)	
)	
CLEVELAND STATE UNIVERSITY)	
BOARD OF TRUSTEES, in their)	DEFENDANTS' MOTION FOR
official capacities; LAURA)	ADDITIONAL TIME TO FILE REPLY
BLOOMBERG, in her official and)	BRIEF IN SUPPORT OF MOTION FOR
individual capacities; and HARLAN M.)	SUMMARY JUDGMENT
SANDS, BENJAMIN WARD,)	
CHRISTOPHER MALLET, CONOR)	
McLENNAN, and WENDY)	
REGOECZI, in their individual)	
capacities,)	
)	
Defendants.)	

NOW COME Defendants Laura Bloomberg, Harlan Sands, Benjamin Ward, Christopher Mallett, Conor McLennan, and Wendy Regoeczi (“Defendants”) and request up to and including September 25, 2024 to file their Reply Brief in Support of Defendants Motion for Summary Judgment (“Reply Brief”). While Defendants are not certain that there are issues to yet be addressed by the Reply Brief, they seek this additional time because their lead counsel and primary author of all of the summary judgment briefing, Karen Giffen, is currently out of the country and did not anticipate being out of the country when Plaintiff Bryan Pesta’s Brief in Opposition to Defendants’ Motion for Summary Judgment (“Opposition Brief”) was originally due. The additional time is needed so that Counsel for Defendants has sufficient time to return and prepare a Reply Brief to address any new matters raised in the Opposition Brief. Defendants do not seek to delay this court’s ruling, only to allow them time to prepare a responsive Reply Brief to any

new matters raised in the Opposition Brief. For these reasons, Defendants respectfully request that an extension of time up to and including September 25, 2024, to submit their Reply Brief.

Respectfully submitted,

/s/ Kerin Kaminski

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***Counsel for Defendants Laura Bloomberg, Harlan
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CERTIFICATE OF SERVICE

I certify that on this 4th day of September 2024, a true and correct copy of this
*Defendants' Motion for Additional Time to File Reply Brief in Support of Motion for Summary
Judgment*, was served via Electronic Mail upon the following party:

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/s/ Kerin Kaminski
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